



Proposed Pesticide Remediation and Risk Management Plan Former Saturo Iwasaki Nursery 2519 Pulgas Avenue, East Palo Alto

April 2008

INTRODUCTION

This fact sheet, prepared by the Regional Water Quality Control Board, San Francisco Bay Region (Water Board), summarizes and describes the March 2008, draft Pesticide Remediation and Risk Management Plan (draft Plan), which has been proposed to address residual pesticide contamination on the former nursery, located at 2519 Pulgas Avenue property (the Site). The Site is located just north of Bay Road within the Ravenswood Industrial Area, East Palo Alto (see figure 1). The draft Plan responds to site cleanup orders adopted by the Water Board in 1992 for all properties in the Ravenswood Industrial Area. The draft Plan has been developed in light of property redevelopment. The Water Board is holding a 30-day public comment period, from April 8 through May 8, 2008, on the draft Plan. If you would like to review a full copy of the draft Workplan, it is available at the Water Board's office (see page 4) or can be downloaded electronically at:

http://www.waterboards.ca.gov/sanfranciscobay/public_notices/public_notice.shtml

The Redevelopment Agency of the City of East Palo Alto entered into an Owner Participation Agreement with the Site owner to redevelop this former nursery property into a light industrial complex consisting of three 1-1/2 story buildings. Environmental cleanup activities will first be completed to address residual pesticides in soil, related to its past agricultural use, in order to protect human health and the environment. The property owners have submitted the draft Plan to address these residual pesticides pollution on the property, prior to its redevelopment. The draft Plan has been developed specifically around the proposed development of the property.

Tell us what you think...

The Water Board will be accepting public comments on the March 2008, draft Pesticide Remediation and Risk Management Plan. Your input is important to us and to the project's success. The information below tells how you can become involved.

PUBLIC COMMENT PERIOD – April 8 through May 8, 2008

(see page 4 for details and information about where you can review site documents)

SITE BACKGROUND

The Site consists of an approximate 5+ acre parcel of land formerly known as the Saturo Iwasaki Nursery. In addition to this piece of property, the approximate .75 acre property at 1885 Bay Road (adjacent to the south) was partially investigated, as an underground utility easement will pass from Bay Road through this parcel and into the 2519 Pulgas Avenue property. Based on historic aerial photographs, the Site was used as a nursery, from the late 1940s until about 2000. Adjacent properties either are, or have been used for agricultural, residential, commercial and industrial uses.



SOIL AND GROUNDWATER CONTAMINATION

Surface soil on the Site contains residual levels of pesticides, primarily dieldrin. A detectable amount of dieldrin was also found in one of six groundwater samples collected in February 2008. Such residuals of pesticide are quite common on former agricultural properties, and are usually a result of normal, legal pesticide application to the crops. As these forms of pesticides are not readily degradable, they accumulate in the soil. They bind tightly to the soil and are not very soluble in water.

In addition to the residual pesticides, the property contained underground fuel storage tanks. These tanks were removed several years ago and were granted regulatory closure. Some of the residual fuels that had leaked around the tanks are still present in the subsurface.

Natural processes will continue to bio-degrade them over time, eventually restoring the quality of underlying groundwater. The property also contains a 280 foot agricultural well, which is to be properly decommissioned with approval by the county oversight agency.

CLEANUP GOALS FOR SOIL AND GROUNDWATER

In order to determine what cleanup of the Site is needed, cleanup goals for soil are established. The cleanup goals for soil are the Water Board's Environmental Screening Levels (ESLs) for an industrial use. ESLs are risk-based concentrations developed by the Water Board, and are for use as screening levels in determining if further evaluation is warranted, in establishing initial cleanup goals, and in estimation of potential health risks. Groundwater sampling data were compared to drinking water standards, also known as Maximum Contaminant Levels.

SCOPE OF THE DRAFT WORKPLAN FOR PESTICIDE MANAGEMENT

The draft Plan being proposed contains three major components related to soil impacts: 1) Encapsulation (cover and containment; 2) Source areas removal and offsite disposal; and 3) Institutional controls. With respect to the low level detection of dieldrin in one of the groundwater samples, this concentration will likely naturally attenuate over time, eventually restoring water quality. It does not appear to be a significant threat to water quality, as it appears localized.

Encapsulation

The planned development of the property will cover approximately 90% of the surface with buildings, pavement or other hard surfaces capable of preventing exposure to pesticide impacted soil and reducing surface water infiltration. The design will include placing a geotextile membrane, as a marker between pesticide impacted soil and clean fill. The underground utility corridors will be excavated and replaced with clean fill. The entire site will be covered with 2 feet of ground base-rock, then the buildings constructed over them. Landscaped areas will also be excavated and replaced with clean fill. In this manner, all landscaping and the majority of subsurface maintenance work can be conducted without encountering impacted soil. Figure 2 shows a site plan with the proposed building locations.



Source Area Removal

Should any pesticide mixing areas or other pollutant source areas be identified during demolition or grading, this material will be characterized, removed from the site and properly disposed of.

Institutional Controls

As the remedy for this site calls for leaving and managing impacted soil in-place, a set of institutional controls will be developed. These generally consist of Risk Management Plans (RMPs) for both construction as well as post construction. The Construction RMP will set forth procedures to address worker protection, construction impact mitigation (i.e. dust control, tracking of impacted soil from site, decontamination of equipment, etc.), stormwater pollution control, soil handling/sampling procedures, etc. The Post Construction RMP will be developed for the long-term management of the impacted soil on the site. The Post Construction RMP will include procedures for entering into the subsurface, identifying underground features (utilities, etc.), ensuring that impacted soil is properly and safely handled. In conjunction with the Post Construction RMP, an Environmental Covenant and Deed Restriction (Deed Restriction) will be placed on the property. This document will be filed on the title of the property and will remain in-place. It will require that all owners and occupants of the property comply with the requirements of the Post Construction RMP, restrict the property to commercial/industrial uses and prohibit the use of groundwater beneath the site.

The remedy as described above will allow the property to be redeveloped as currently proposed in a manner that is protective of human health and the environment. Once completed, the remedy and development will prevent exposure to future occupants from the underlying pesticide impacted soil, eliminating any health risk posed by it. In addition, normal maintenance of the facility can be accomplished without intruding into the pesticide impacted material.

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GET INVOLVED! - PUBLIC PARTICIPATION OPPORTUNITIES

The public comment period on the Proposed Pesticide Remediation and Risk Management Plan, dated March 2008, will extend from April 8 through May 8, 2008. Your comments to the Water Board are invited. All written and verbal comments received by the Water Board will be considered prior finalizing the draft Workplan.

Written Comments: Written comments postmarked or e-mailed, no later than May 8, 2008, should be sent to:

Mark Johnson
RWQCB
1515 Clay Street, Suite 1400
Oakland, CA 94612

mjohnson@waterboards.ca.gov

Site Documents: Documents related to the 2519 Pulgas Avenue Site are available for public review at the Regional Water Quality Control Board's office in Oakland. An e-copy of the complete draft Remediation and Risk Management Plan document and this fact sheet are available at:

http://www.waterboards.ca.gov/sanfranciscobay/public_notices/public_notice.shtml

For Further Information: If you have questions or comments about the proposed clean up plan for the 2519 Pulgas Avenue, East Palo Alto Site, you may call Mark Johnson at (510) 622-2493.



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